



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

Teralyn Sue BAKER

Defendant.

Magistrate Case No.: 08MJ8187
COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about February 28, 2008, within the Southern District of California, defendant Teralyn Sue BAKER did knowingly and intentionally import approximately 23.20 kilograms (51.04 pounds) of cocaine a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Special Agent Lance Swanson
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 29th,
DAY OF FEBRUARY 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Teralyn Sue BAKER

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes
6 furnished to U. S. Immigration and Customs Enforcement Special Agent L. Swanson.

7 On February 28, 2008 at approximately 1619 hours, Teralyn Sue BAKER entered
8 the United States at the Calexico, California, West Port of Entry. BAKER was the sole
9 occupant driver and registered owner of a green 2005 Ford Mustang.

10 During the primary inspection, Customs and Border Protection (CBP) Officer J.
11 Rodriguez received a negative Customs declaration from BAKER. BAKER stated she
12 had been visiting her boyfriend in Mexico. BAKER stated she lives in El Cajon,
13 California. BAKER became very talkative volunteering more information than was
14 requested. BAKER stated she was in the modeling business and was waiting for a job
15 interview with a modeling company in Phoenix, Arizona. BAKER stated she owned the
16 vehicle. BAKER and the vehicle were referred to secondary inspection.

17 In the vehicle secondary lot, CBP K-9 Officer Barela received an alert from his
18 Narcotics Detection Dog (NDD) near the driver's side door rocker panel and rear seat
19 area.

20 CBP Officer F. Lopez discovered 21 packages inside the driver's side and
21 passenger's side rocker panels of the vehicle. One of the packages was probed and a
22 sample of a white powdery substance was obtained, which field tested positive for
23 cocaine. The 21 packages had a combined net weight of approximately 23.20
24 kilograms (51.04 pounds).

25 BAKER was placed under arrest and advised of her Constitutional Rights, which
26 she acknowledged and waived, agreeing to answer questions. BAKER stated to Special
27 Agent Swanson she was going to be paid \$1,500.00 to smuggle narcotics into the
28 United States.

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